

**DECLARATION OF ROBERT DEWITTY  
IN SUPPORT OF MOTION FOR TEMPORARY RESTRAINING ORDER (TRO)**

I, ROBERT M. DEWITTY, attorney for Plaintiff, declare as follows:

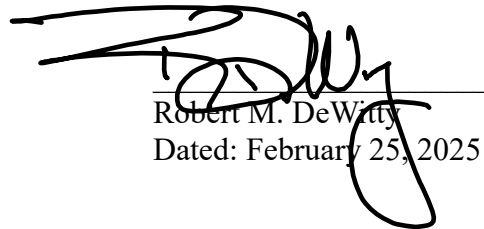
1. The following is true to my knowledge, except for matters alleged upon information and belief, and as to those matters, I also believe them to be true.
2. Defendant Internet Stores, as of the filing of this TRO, are still selling infringing and knock-off Stainless Steel Rag products.
3. In my professional view as a former patent examiner and registered patent attorney who has prosecuted design patent applications, I believe the design under U.S. D1,051,537 S (\*\*537) is applicable to the designs of Stainless Steel Rag.
4. In my analysis of Infringing, Stainless Steel Rag Products, I have identified more than 20 different infringing Defendants and/or products, all operating Defendant Internet Stores.
5. On information and belief, infringing Stainless Steel Rag Products were marketed and sold to residents of the Northern District of Illinois.
6. A review of the multitude of Amazon, Ebay, and other online Sellers for the Infringing Products show prices as low as \$24. According to the article “How to Stop Price Erosion”, low prices lead to price erosion, which will likely be irreversible as consumers grow used to paying the cheaper, or less expensive price, for an item (<https://pattern.com/blog/price-erosion-how-to-stop/>, accessed July 2023).
7. On information and belief, Defendants move funds from their Internet Store Accounts to accounts overseas.
8. Through significant efforts, we have been unable to locate the true identity of Defendants.

9. I have reviewed the file wrapper for the \*\*537 patent, and in my opinion, as a patent attorney and former patent examiner, the design was subjected to an extensive amount of prior art comparison.

10. It is my experience, in other similar cases, that Defendants do not provide accurate addresses of their businesses.

11. I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true, and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment.

Signed,



Robert M. DeWitty  
Dated: February 25, 2025